

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Case No. 22-CR-222 (1) (NEB/TNL)

Plaintiff,

**DECLARATION OF MATTHEW
FORSGREN IN SUPPORT OF
DEFENDANT ALISHIRE'S MOTION
TO MODIFY CONDITIONS OF
RELEASE**

v.

Liban Yasin Alishire (1),

Defendant.

I, Matthew Forsgren, submit this declaration in support of Alishire's Motion to Modify Conditions of Release and state as follows:

1. I am an attorney at Forsgren Fisher McCalmont DeMarea Tysver LLP and counsel of record for Defendant Liban Yasin Alishire in the above-captioned matter.
2. Beginning in early 2023, I have had numerous communications with counsel for the Government to discuss whether the Government would be open to Mr. Alishire selling his Kenyan real estate and forfeiting the proceeds.
3. In each of these conversations, counsel for the Government did not express opposition to the concept. However, they have referred to a potential process requiring Department of Justice coordination or approval. They expressed to me that they would attempt to discuss this issue with officials in the Department of Justice.
4. On June 2, 2023, aware that several months had passed without resolution of the issue, I emailed counsel for the Government to ask for a status update. I was informed that the discussions remained ongoing.

5. On or about July 28, 2023, I spoke by phone to Government counsel about the same topic. I was again informed that the process remained ongoing.

6. The foregoing statements should not be taken to imply any perception of a lack of candor on the part of Government counsel, who has been professional in all respects. Rather, these statements are made only to observe that for reasons unknown to myself or to Mr. Alishire, there has been a substantial delay in the determination of whether Mr. Alishire may personally sell his Kenyan Real estate, and remit the proceeds.

Dated: September 27, 2023

s/ Matthew D. Forsgren
Matthew D. Forsgren